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October 6<sup>th</sup>, 2009

Docket Control Center Arizona Corporations Commission 1200 West Washington St. Phoenix, AZ 85007

RE: Emergency Rate Surcharge Docket W-02105A-07-0510 Decision 70837

Mt. Tipton Water Company expresses our most sincere apologies for the extreme tardiness of these reports. There has been some confusion in our office about who was responsible for doing this particular report and the other related report of the same docket and decision number. Now that it is clear that the field manager is responsible for these reports, I can guarantee that you will receive them in a timely manner.

Enclosed are the four missing reports in regards to ADEQ compliance dated May 15<sup>th</sup>, June 15<sup>th</sup>, July 15<sup>th</sup>, and August 15<sup>th</sup>, 2009. We are hoping that you will accept the September report of Ms. Cleveland, our former business administrator, even though it was not formatted in the way staff wanted. We are aware that another report is due on the 15<sup>th</sup> of this month. The reports may seem sparse, but Mt. Tipton would like to note that we are getting very close to being in compliance with the ADEQ. There are some expensive items that would bring us into compliance, yet these are impossible for us to finance until such a time that our permanent rate case may be approved. I request advisement from staff as far as whether these reports contain all of the necessary information. Please contact me at your earliest convenience on my company cell. phone if there is something that can be improved upon, 928-715-6422. Also enclosed is a list of compliance items from the ADEQ which these reports reference by number. The other missing reports dated May 1<sup>st</sup>, June 1<sup>st</sup>, July 1<sup>st</sup>, August 1<sup>st</sup>, and October 1<sup>st</sup>, 2009 will follow shortly.

Mt. Tipton Water Company has worked diligently for the last 14 months to come into compliance with the ADEQ and the ACC, and to regain the respect of our community. We would not knowingly do anything to jeopardize this. Once again, please accept our sincerest apologies. As always, we look forward to working with you in the future.

Thank you,

Tim Clark Field Manager

Mt. Tipton Water Company

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May 15, 2009

Docket Control Center Arizona Corporation Commission 1200 West Washington St. Phoenix, AZ 85007

RE: Emergency Rate Surcharge Docket W-02105A-07-0510 Decision 70837

Mt. Tipton Water Company has been working on the following compliance items for the ADEQ. In the past month we have identified and repaired several leaks in our system. The first was on 9<sup>th</sup> Street and Eldorado Street. There was an excessive leak from the packing of the shut-off valve for Eldorado Street. Another leak was on Lariat Street, south of 14<sup>th</sup> street. This was caused by a cracked coupling at the blow-off at the end of Lariat Street. The third leak was on 10<sup>th</sup> Street and Eldorado Street at a customer's meter (on the company's side of the meter). This was the result of a bad glue joint. The last leak was on Calico Street at the blow-off. This was leaking from the packing nut of the shut-off valve. All of the above leaks were slow and appeared as though they had been leaking for quite some time.

The above applies to Item #9 under "Distribution System and Overall Water Loss" in reference to ADEQ report Inspection ID # 123663. This was included in the September, 2009 report already filed.

Thank you very much,

Tim Clark Field Manager

June 15, 2009

Docket Control Center Arizona Corporations Commission 1200 West Washington St. Phoenix, AZ 85007

RE: Emergency Rate Surcharge Docket W-02105A-07-0510 Decision 70837

Mt. Tipton Water Company has been working on the following compliance items for the ADEQ. In the past month we finished the repair work on the LDS Well #3, 55-520733. This well had been out of operation for some time with a bad thrust bushing and bearings. ADEQ was notified. After the removal and replacement of the pump, we replaced the 3 inch well head with black iron pipe. Also, the two 3 inch tees were also replaced with black iron. The well head was caulked and taped with 3m tape under ground. The sample tap was also redone with new fittings and tap.

We also identified and repaired several leaks in the system. The first leak was on Edgemont St. between 8th St. and 9<sup>th</sup> St. on a six inch line. Another leak was on 7<sup>th</sup> St. just north of Pierce Ferry Rd. on a six inch line. The last leak was just west of Canyon Rd. and Pierce Ferry Rd. at the saddle of a service line to an abandoned house.

The above applies to items #2 & #3 under "Wells", item #12 under "Inspection Recommendations," and also addresses item #9 under "Distribution System and Overall Water Loss," in reference to ADEQ report Inspection ID # 123663.

Thank you very much,

Tim Clark

Field Manager

July 15, 2009

Docket Control Center Arizona Corporations Commission 1200 West Washington St. Phoenix, AZ 85007

RE: Emergency Rate Surcharge Docket W-02105A-07-0510 Decision 70837

Mt. Tipton Water Company has been working on the following compliance items for the ADEQ. In the past month we identified and repaired two problems at the horizontal spring well, number 8, 55-601848 that were causing water loss.

A 2 inch valve was leaking from the packing and appeared as though it had been leaking for some time. We also found that this well was air locking the spring line to the mid range tanks, then the water was backing up and running out of the vent pipes. This would mostly happen late at night (conveniently). We installed an air gap with a vent on that line and this problem was resolved.

The above applies to item #9 under "Distribution System and Overall Water Loss," in reference to ADEQ report Inspection ID # 123663.

Thank you very much,

Tim Clark

Field Manager

August 15, 2009

Docket Control Center Arizona Corporations Commission 1200 West Washington St. Phoenix, AZ 85007

RE: Emergency Rate Surcharge Docket W-02105A-07-0510 Decision 70837

Mt. Tipton Water Company has been working on the following compliance items for the ADEQ. In the past month we have identified and repaired three slow leaks in our system. The first leak was at Edgemont St. and Pierce Ferry Rd. in front of the community center at a valve packing. This was discovered after a two inch line broke behind the community center. This necessitated finding the valve in question to turn off the water in order to repair the line break. The other leaks were a valve on Pierce Ferry Rd. and Bullhead St. that was found to be leaking while repairing another leak at a meter. This meter was west of 4<sup>th</sup> St. on Bullhead St. and had a slow leak on the company's side of the meter at the glue joint.

There were also two major line breaks. The first was on Laurel Dr. north of 15<sup>th</sup> St. At the bottom of the hill, 20 feet of 6 inch pipe was replaced. The second break was on 10<sup>th</sup> St. and Edgemont St. on a 6 inch plastic tee. This was replaced with cast iron.

The above applies to Item #9 under "Distribution System and Overall Water Loss," in reference to ADEQ report Inspection ID # 123663.

Thank you very much,

Tim Clark Field Manager



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# **Compliance Needs for ADEQ**

In reference to ADEQ Report Inspection ID # 123663

# **Major Deficiencies:**

## Monitoring and Reporting

1. The system currently has four unresolved monitoring and reporting violations.

### Wells

- 2. ADEQ requests that the system repair and seal the direct openings into well number 1. Extra silicone sealant should be added to wells #2,3, and 6.
- 3. ADEQ requests that you remove the galvanized pipe and fittings from well number1. This also applies to any other well, within the system, with galvanized pipe on the surface.
- 4. In order to reduce the current level of water loss and stop erosion around both the building base and the discharge line; ADEQ requests that you replace the auto sensor on the well #6 to prevent excess water from overflowing the storage tanks at night.
- 5. ADEQ requests that you repair the leak at the center well head on well number 8.
- ADEQ requests that you secure the well site #9B.preferably with a fence that meets ADEQ standards.
- ADEQ requests that you furnish the ADWR well permit, well number, ADEQ source approval data and Construction Certification for each well in system.
- 8. ADEQ requests that the water company supply the same data requested in Item #4 for this well.
- 9. Due to location and form of these three wells and the conditions identified they are probably ground water under the influence of surface water. ADEQ requests that the your engineer conduct and MPA test and other testing which may be needed to determine if the wells are GWUI or can be classified as true groundwater.

#### **Kevin's Tanks**

- 10. Clean or repair black plastic tanks at Kevin's yard.
- 11. Transfer pump #5 is leaking. The pump requires repair or replacement.
- 12. Storage tank base for well #5 is failing due to loss of steel and base retention ring. ADEQ requests that the ring be repaired or replaced and the lost base fill replaced.
- 13. ADEQ requests that you repair the eroded Mid range tanks bedding and broken ring.

#### EPD'S

14. ADEQ requests that the required sampling taps be installed on each EPDS which does not already have one.

#### **Booster/Transfer Stations**

- 15. ADEQ requests that you repair or replace the valve packing in the leaking pump in booster station # 1.
- ADEQ requests that you repair or replace the out of service pump at the Mid-Range booster station.
- 17. ADEQ requests that the pumps in question be upgraded and the interconnect piping be increased in diameter to a size capable of handling the resupply demand.
- 18. ADEQ requests that a constructed air gap meeting standards be installed and the galvanized piping be removed from the standpipe.
- 19. ADEQ recommends that prior to submittal a constructed air gap be added to the top of the Detrital Well standpipe, and all galvanized be removed from site.

#### **Minor Deficiencies:**

## Wells

1. ADEQ requests a fence around well #7 and the storage tanks at Kevin's yard.

#### **Booster/ Transfer Stations**

- 2. ADEQ requests the eroded pit at Kevin's tanks and leaking roof be repaired and the pumps be replaced and upgraded.
- 20. ADEQ requests that the failed pump located at the Mid range transfer station be repaired or upgraded to higher capacity pumps.

#### Tanks

4. ADEQ requests that the missing block and bedding at mid range tank be repaired.

- 5. ADEQ has requested the ladder on tanks be secured.
- 6 & 7.. ADEQ requests that the bedding on upper range tank and the water level gauge scale be replaced or repainted.
- 8. ADEQ requests that the base ring for the tank at well #5 be repaired and the lost fill replaced.

  Also the water flow meter needs to be repaired or replaced.

## **Distribution System**

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9. ADEQ requests that all locatable leaks are repaired and lines replaced as needed.

#### Inspection Recommendations

- ADEQ recommends doing a survey of the system and creating a Master Plan, including whether it is
  feasible to bring the non-potable water and the Detrital well back into the system. We also recommend
  replacing meters as a way to address water loss.
- 2 ADEQ requests that all exposed PVC pipe is been wrapped or painted.
- 3. ADEQ requests that the company secure all electrical controls for the wells and booster stations.
- 4. ADEQ requests that all access hatches on storage tanks are sealed.
- 5. ADEQ requests that all overflow lines from storage tanks be sealed.
- 6. ADEQ requests the lines be moved away from the roads and trenched deeper to avoid line failure from traffic, as part of the Master Plan.
- 7. ADEQ requests that the site gauge on well number 5 be repaired or replaced.
- 8. ADEQ requests that the storage tank for well number 5 is upgraded to a 60,000 gallon tank as originally planned for.
- 9. ADEQ requests that the well vents on well #1 and #3 are rotated.
- 10. ADEQ requests that the sampling tap on well #1 be replaced or the corrosion removed.
- 11. ADEQ requests that you replace the well #2 threaded pipe nipple.
- 12. ADEQ requests that the sampling tap for well #3 be replaced.
- 13. ADEQ requests that the meter on the discharge line for well #5 be repaired or replaced.
- 14. ADEQ requests that chlorine injector valves be installed on the discharge line from each well; etc.